

EXHIBIT A

EXHIBIT A

Delia Flores

From: Lynn Carpenter
Sent: Monday, April 7, 2025 10:09 AM
To: Dominique Boubion; rvalentine@galipolaw.com
Cc: Luis A. Carrillo (lac4justice@gmail.com); Michael Carrillo; Alejandro Monguia; Joseph Esposito; Carrillo Law Firm; Stefany Anderson; Eugene P. Ramirez; Delia Flores; Support Center; Athena N. Reddersen; Angela Thompson
Subject: Cernas (PC) L.R. 7-3 Request to Meet and Confer re Mtn to Continue

Dominique & Renee,

Good morning. I am following up regarding my email below requesting a stipulated continuance of the Court's scheduling deadlines in this matter, as this case has just been reassigned to our firm. Please respond to this email in writing today to inform us as to the plaintiffs' position.

If you are unwilling to stipulate, please consider this our **C.D. Local Rule 7-3 request to meet and confer on or before April 9, 2025** regarding defendants' motion to continue the Court's scheduling order deadlines and trial date. Please also provide the date/time you are available for a meet and confer teleconference prior to close of business on Wednesday.

Thanks very much for your anticipated cooperation.

Lynn Carpenter

Partner



801 S. Figueroa St., 15th Floor
Los Angeles, CA 90017
Main: (213) 624-6900
Direct: (213) 486-2272

Lynn.Carpenter@manningkass.com | manningkass.com

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From: Lynn Carpenter <Lynn.Carpenter@manningkass.com>
Sent: Tuesday, April 1, 2025 12:46 PM
To: Alejandro Monguia <amonguia@galipolaw.com>; Joseph Esposito <jesposito@snw-law.com>
Cc: Luis A. Carrillo (lac4justice@gmail.com) <lac4justice@gmail.com>; Michael Carrillo <mc@carrillofirm.com>; Dominique Boubion <db@carrillofirm.com>; Carrillo Law Firm <team@carrillofirm.com>; rvalentine@galipolaw.com; Stefany Anderson <sanderson@galipolaw.com>; Eugene P. Ramirez <Eugene.Ramirez@manningkass.com>; Delia Flores <Delia.Flores@manningkass.com>; Support Center <Support.Center@manningkass.com>; Athena N. Reddersen

<Athena.Reddersen@manningkass.com>

Subject: Cernas (PC) Depos of Sanchez, Deboom

Good morning. The defense of this matter has been reassigned to our firm. We will be serving an objection and will meet and confer with you in order to reset these depositions.

We will be seeking a 90-120 day continuance of the current scheduling order deadlines. We also have a scheduling conflict with the current trial date. Please confirm that you will join in a stipulation for a brief continuance, and we will forward a draft stipulation for your review.

Thanks very much.

Lynn Carpenter

Partner



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Los Angeles, CA 90017

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From: Janet Keuper <jkeuper@snw-law.com>

Sent: Tuesday, April 1, 2025 12:33 PM

To: Alejandro Monguia <amonguia@galipolaw.com>; Joseph Esposito <jesposito@snw-law.com>

Cc: Scarlet Meman <smeman@snw-law.com>; Lucy Garcia <lgarcia@snw-law.com>; Luis A. Carrillo <lac4justice@gmail.com> <lac4justice@gmail.com>; Michael Carrillo <mc@carrillofirm.com>; Dominique Boubion <db@carrillofirm.com>; Carrillo Law Firm <team@carrillofirm.com>; rvalentine@galipolaw.com; Stefany Anderson <sanderson@galipolaw.com>; Eugene P. Ramirez <Eugene.Ramirez@manningkass.com>; Delia Flores <Delia.Flores@manningkass.com>; Lynn Carpenter <Lynn.Carpenter@manningkass.com>; Support Center <Support.Center@manningkass.com>; Athena N. Reddersen <Athena.Reddersen@manningkass.com>

Subject: RE: Cernas v. County of Los Angeles

This message needs your attention

- Some Recipients have never replied to this person.

Mark Safe

Report

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Good Morning Alejandro – The Manning Kass will be taking over the defense in this case, as well as the companion case. Substitutions will be filed shortly in both cases. Your notice of deposition for Deputies

Deboom and Sanchez has been forwarded Mr. Ramirez and his team. I leave it to them to respond to your inquiry.

Janet L. Keuper, Esq.
Seki, Nishimura & Watase, PLC
600 Wilshire Blvd., Suite 1250
Los Angeles, CA 90017
(213) 481-2869

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From: Alejandro Monguia <amonguia@galipolaw.com>
Sent: Tuesday, April 1, 2025 10:12 AM
To: Janet Keuper <jkeuper@snw-law.com>; Joseph Esposito <jesposito@snw-law.com>; Nicole Castronovo <ncastronovo@snw-law.com>
Cc: Stephanie Chin <Schin@snw-law.com>; Lucy Garcia <lgarcia@snw-law.com>; Luis A. Carrillo (lac4justice@gmail.com) <lac4justice@gmail.com>; Michael Carrillo <mc@carrillofirm.com>; Dominique Boubion <db@carrillofirm.com>; Carrillo Law Firm <team@carrillofirm.com>; rvalentine@galipolaw.com; Stefany Anderson <sanderson@galipolaw.com>
Subject: RE: Cernas v. County of Los Angeles

Good morning Counsel,

Would you please let us know if the depositions of Deputy Sanchez and Deputy DeBoom will be going forward on April 10? If that date does not work for the deputies or your office, would you please propose a few alternative dates?

Thank you.

Best Regards,

Alejandro E. Monguia, Paralegal | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: amonguia@galipolaw.com

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From: Alejandro Monguia
Sent: Monday, March 24, 2025 11:00 AM
To: Janet Keuper <jkeuper@snw-law.com>; Joseph Esposito <jesposito@snw-law.com>; Nicole Castronovo <ncastronovo@snw-law.com>
Cc: Stephanie Chin <Schin@snw-law.com>; Lucy Garcia <lgarcia@snw-law.com>; Luis A. Carrillo (lac4justice@gmail.com) <lac4justice@gmail.com>; Michael Carrillo <mc@carrillofirm.com>; Dominique Boubion <db@carrillofirm.com>; Carrillo

Law Firm <team@carrillofirm.com>; rvalentine@galipolaw.com; Stefany Anderson <sanderson@galipolaw.com>

Subject: Cernas v. County of Los Angeles

Good morning Counsel,

Please find attached plaintiffs' amended notice of the depositions of Deputy Sanchez and Deputy DeBoom. As always, should the noticed date not work for your office or the deponents, please let us know and we will be happy to work with you to find a mutually convenient or dates for these depositions.

Best Regards,

Alejandro E. Monguia, Paralegal | **Law Offices of Dale K. Galipo** | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: amonguia@galipolaw.com

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